

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
NORTHWESTERN DIVISION

United States of America,)	
)	
Plaintiff,)	Case Number 1:20-cr-75 and
)	3:20-cr-42 (SEALED)
vs.)	
)	
KASSANDRA GRANT,)	MOTION FOR PRETRIAL RELEASE
)	
Defendant.)	

Comes now, Kassandra Grant, Defendant above-named, by and through her attorney, Ashley A. Flagstad, and moves this Court for an Order granting her release to seek treatment. Ms. Grant has been accepted to seek a twelve (12) week residential treatment at Springboard Recovery in Scottsdale, Arizona. *See* attached Acceptance Letter. The SpringBoard Recovery Director of Admissions indicated he currently has one female bed available. As discussed at her Detention Hearing on July 1, 2020, the Court would be inclined to allow her release to a treatment facility. Ms. Grant gravely needs substance abuse therapeutic and rehabilitation assistance. She had a miscarriage at 15 weeks and is no longer pregnant.

As discussed in the SpringBoard Recovery Acceptance Letter, Ms. Grant will be escorted by a Sober Companion, as contracted by SpringBoard Recovery. It is Ms. Grant's intent to travel on a direct flight from Minot, ND to Phoenix, AZ via Allegiant Airlines with the Sober Companion. Ms. Grant requests she be transported from the Ward County Jail to the Minot International Airport by the U.S. Marshalls or by her family. The Defendant consents to any and

all release conditions that would be imposed by the Court.

Dated at Minot, North Dakota, this 16th day of July, 2020.

PRINGLE & HERIGSTAD, P.C.

By /s/ Ashley Flagstad
Ashley A. Flagstad (ID #07503)
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P.O. Box 1000
Minot, ND 58702-1000
(701) 852-0381
Attorney for Defendant

Certificate of Service

I hereby certify that on the 16th day of July, 2020, the following document:

Motion for Pretrial Release and Exhibit 1- Acceptance Letter

was filed electronically with the Clerk of Court through ECF, and that ECF will send a Notice of Electronic Filing (NEF) to the following:

Dawn Dietz	dawn.deitz@usdoj.gov
Rick Volk	rick.volk@usdoj.gov

I further certify that copy of the foregoing documents will be mailed by first class mail, postage paid, to the following non-ECF participants:

N/A

Dated this 16th day of July, 2020.

/s/ Ashley Flagstad
Ashley A. Flagstad (ID #07503)
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